

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Shelley J. Tynan

Debtor.

Chapter 13 No. 14-45778

Hon. Walter Shapero

OBJECTIONS TO CONFIRMATION

NOW COMES CitiMortgage, Inc., by and through their attorneys, Trott & Trott, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a mortgage on real property owned by the debtor(s) and located at 54902 Burlington Dr, Shelby Township, MI 48315-1639;
2. That the mortgage is in material default pursuant to the Creditor's Records filed by Creditor;
3. That the Debtor's Plan of Reorganization proposes to pay Creditor a regular monthly payment of \$2,329.00 and a pre-petition arrearage of \$47,310.85 at the rate of \$859.65 per month with 0% interest over 58 months;
4. That according to Creditor's Records , Creditor must receive the regular monthly payment of \$2,329.00 plus a pre-petition arrearage of \$61,942.27 at the rate of at least \$1,067.97 per month in order for the arrearage to be cured within the proposed length of time, i.e., 58 months;
5. That the Debtor's proposed Plan of Reorganization understates the pre-petition arrearage and the monthly payment on the pre-petition arrearage;
6. That the debtor's proposed Plan of Reorganization is underfunded;

Trott & Trott, P.C.
31440 Northwestern
Hwy
Ste 200
Farmington Hills, MI
48334-5422
Phone 248.642.2515
Facsimile 248.642.3628

WHEREFORE, Creditor prays that Confirmation be denied.

Respectfully Submitted,
Trott & Trott, P.C.

Dated: May 8, 2014



/S/ Shawn C. Drummond (P58471)

Attorney for CitiMortgage, Inc.
31440 Northwestern Hwy Ste 200
Farmington Hills, MI 48334-5422
248.642.2515
Email: EasternECF@trottlaw.com

T&T #410627B03

TROTT & TROTT, P.C.
31440 NORTHWESTERN
HWY
STE 200
FARMINGTON HILLS, MI
48334-5422
PHONE 248.642.2515
FACSIMILE 248.642.3628